

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

SERGIO NAVARRO, THERESA
GAMAGE, DAYLE BULLA, JANE
KINSELLA, and ERICA McKINLEY, on
their own behalf, on behalf of all others
similarly situated, and on behalf of the
Wells Fargo & Company Health Plan and
its component plans,

Plaintiffs,

v.

WELLS FARGO & COMPANY,

Defendant.

No. 0:24-cv-03043-LMP-DLM

**JOINT MOTION FOR EXTENSION
OF DEADLINES FOR
DEFENDANT’S MOTION TO
DISMISS THE AMENDED
COMPLAINT**

Plaintiffs Sergio Navarro, Theresa Gamage, Dayle Bulla, Jane Kinsella, and Erica McKinley (“Plaintiffs”) and Defendant Wells Fargo & Company (“Defendant” and together with Plaintiffs, the “Parties”), by and through their respective counsel of record, respectfully request an extension of the deadlines applicable to Defendant’s forthcoming Motion to Dismiss the Amended Complaint, and for related briefing. In support of this Motion, the Parties state as follows:

1. On July 30, 2024, Plaintiffs filed the Complaint (“Complaint”) in the above-captioned action. (ECF No. 1.)
2. On March 24, 2025, the Court granted Defendant’s Motion to Dismiss the Complaint. (ECF No. 57.)

3. On April 17, 2025, the Court granted Plaintiffs leave to amend the Complaint and ordered that Wells Fargo either answer or file a motion under Federal Rule of Civil Procedure (“Rule”) 12 within 21 days of such amendment. (ECF No. 62.)

4. On May 8, 2025, Plaintiffs filed the Amended Class Action Complaint (“Amended Complaint”) in the above-captioned action. (ECF No. 64.)

5. Defendant has informed Plaintiffs that it intends to file a Motion to Dismiss the Amended Complaint pursuant to Rule 12.

6. The Parties have agreed, subject to the Court’s approval, to a brief extension of the deadlines concerning Defendant’s time to answer, move, or otherwise respond to the Amended Complaint, and for related briefing beyond the deadlines set by the Court and Local Rule 7.1.

7. The Parties respectfully request that the Court enter an order providing that: (i) the deadline for Defendant to move to dismiss the Amended Complaint is June 12, 2025; (ii) the deadline for Plaintiffs’ opposition is July 17, 2025; and (iii) the deadline for Defendant’s reply is August 7, 2025.

Agreed to and submitted by:

Dated: May 19, 2025

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